



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 4, 2006

David Ragsdale  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, OWW-130  
Seattle, Washington 98101

*Sent by electronic mail to: [ragsdale.dave@epa.gov](mailto:ragsdale.dave@epa.gov)*

**RE: NPDES Permit No. WA-00019002**  
**U.S. Fish and Wildlife Service - Leavenworth National Fish Hatchery**

Dear Mr. Ragsdale:

The Washington Department of Ecology (Ecology) has reviewed the draft NPDES permit and fact sheet for the Leavenworth National Fish Hatchery (hatchery). This draft permit places conditions on the discharge of pollutants from the hatchery to Icicle Creek pursuant to the provisions of the Clean Water Act, 33 U.S.C. § 1251 *et seq.* Ecology has prepared the following comments for consideration in the final permit.

**Comment 1 – Draft Permit, page 18 at top of page.** The address shown in the draft permit for Ecology's Central Regional Office is incorrect. The correct address, which should be shown in this permit, is:

Washington Department of Ecology  
Central Regional Office  
15 W Yakima Avenue, Ste 200  
Yakima, WA 98902-3452

**Comment 2 – Fact Sheet, Section III ("Receiving Water"), pages 8 through 13.** This section correctly identifies the pollutants of concern in the hatchery's discharge to be nitrogen, phosphorous, total suspended solids (TSS), settleable solids (SS), dissolved oxygen, pH, and temperature (see "Pollutants of Concern," page 9). This section also cites and summarizes Ecology's water quality monitoring and modeling study, "Wenatchee River Basin Dissolved Oxygen, pH, and Phosphorous Total Maximum Daily Load Study," published in April 2006. Washington Administrative Code (WAC) 1273-221A-100(6) requires water quality studies of the receiving water when the effluent is a large fraction of the flow in the receiving water. Although the fact sheet discusses certain parts of Ecology's study that are relevant to the hatchery permit, it is not clear whether a receiving water study is required or whether the total maximum daily load (TMDL) study is adequate.



**Comment 3 – Mixing and Dilution (Permit and Fact Sheet).** The draft permit does not establish a mixing zone, and mixing and dilution are not addressed in the fact sheet. For this reason, effluent limits should reflect water quality standards at the point of discharge. Pollutants that could potentially exceed their respective water quality standards upon discharge (e.g., at outfall 002) are ammonia, dissolved oxygen, turbidity, and temperature. This topic is not mentioned and should be addressed in the fact sheet if not included in the permit.

**Comment 4 – Chemicals Used For Disease Control (Permit and Fact Sheet).** Although the draft permit includes a reporting requirement for the use of disease control chemicals, there are no reporting requirements for the discharge of these chemicals and there is no limitation on the discharge of residual chlorine from disinfection. As stated in the fact sheet (page 12):

“The Ecology General Permit limits the use of these chemicals to only those approved for hatchery use and used in accordance with label instructions. The Ecology General Permit also prohibits the discharge of these chemicals in concentrations which would exceed federal or state water quality standards and requires that BMPs be used to minimize the concentration of these chemicals in the facilities’ discharge.”

As currently written, the permittee will only be required to keep records on disease control chemicals used at the facility, and will not be required to monitor discharge. The fact sheet speaks to the possibility that chlorine may be used for disease control. The permit, however, does not include the effluent limit for chlorine, which is included in Ecology’s general permit. Because chlorine may be used at this facility, it would be appropriate to include this effluent limit in this permit.

Ecology appreciates the opportunity to submit these comments on the draft permit for the Leavenworth National Fish Hatchery.

Please call Rick Frye at (509) 575-2821 if you have questions relating to pollutant discharges from the hatchery, or Jonathan Merz at (509) 454-7207 if you have questions relating to the TMDL for Icicle Creek.

Sincerely,



Denise E. Mills, LHG  
Section Manager  
Water Quality Program

DEM:ww

cc: Richard J. Frye, WQ-CRO  
Jon Merz, WQ-CRO  
Dave Peeler, WQ-HQ